

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

Pursuant to OST

**NOTICE OF DEBTOR'S MOTION FOR ENTRY OF AN ORDER
SEALING THE REDACTED PORTIONS AND EXHIBITS OF THE DEBTOR'S
OMNIBUS REPLY IN SUPPORT OF ITS MOTION FOR AN ORDER APPOINTING
RANDI S. ELLIS AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

PLEASE TAKE NOTICE that, on the date set by the Court pursuant to a proposed Order Shortening Time (the "OST") and Application, as defined below, to be submitted, LTL Management LLC, the above-captioned debtor (the "Debtor"), by and through its counsel,

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Court, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to D.N.J. LBR 9018-1 to seal the redacted information referenced in and confidential excerpts attached to (together “Confidential Information”) its *Omnibus Reply in Support of Its Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants*. Confidential Information includes those certain excerpts from depositions of the following deponents that the Debtor designated confidential: Erik Hass, John Kim, James Murdica, David Molton, and Mikal Watts. Additionally, the Confidential Information includes certain other sensitive documents, and references thereto, regarding the negotiation of the term sheet and plan support agreements. The parties have agreed, in the interest of time and with full reservation of rights, to treat such designations as confidential until otherwise decided by this Court.

PLEASE TAKE FURTHER NOTICE that, contemporaneously with the filing of the Debtor’s Motion to Seal (the “Motion”), the Debtor filed an *Application for Order Shortening Time and Certain Other Relief* (the “Application”) requesting that the Court hear its Motion on May 3, 2023, at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon the Debtor’s undersigned counsel, by the time set forth in the Court’s order entered with respect to the Application.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing

Dated: April 28, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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